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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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JUL 5 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
Petition of WorldCom, Inc. Pursuant)
to Section 252(e)(5) of the)
Communications Act for Expedited)
Preemption of the Jurisdiction of the)
Virginia State Corporation Commission)
Regarding Interconnection Disputes)
with Verizon Virginia Inc., and for)
Expedited Arbitration)

CC Docket No. 00-218

In the Matter of)
Petition of Cox Virginia Telecom, Inc.)
Pursuant to Section 252(e)(5) of the)
Communications Act for Preemption)
of the Jurisdiction of the Virginia State)
Corporation Commission Regarding)
Interconnection Disputes with Verizon)
Virginia Inc. and for Arbitration)

CC Docket No. 00-249

In the Matter of)
Petition of AT&T Communications of)
Virginia Inc., Pursuant to Section 252(e)(5))
of the Communications Act for Preemption)
of the Jurisdiction of the Virginia)
Corporation Commission Regarding)
Interconnection Disputes With Verizon)
Virginia Inc.)

CC Docket No. 00-251

**VERIZON VIRGINIA INC.'S OBJECTIONS
TO AT&T'S FIFTH SET OF DATA REQUESTS**

In accordance with the Procedures Established for Arbitration of Interconnection
Agreements Between Verizon and AT&T, Cox and WorldCom, CC Docket Nos. 00-218,
00-249, 00-251, DA 01-270, Public Notice (CCB rel. February 1, 2001), Verizon
Virginia Inc. ("Verizon") objects as follows to the Fifth Set of Data Requests served on
Verizon by AT&T Communications of Virginia ("AT&T") on June 29, 2001.

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GENERAL OBJECTIONS

1. Verizon objects to AT&T's Data Requests to the extent that all or any of them seek confidential business information covered by the Protective Order that was adopted and released on June 6, 2001. Such information will be designated and produced in accordance with the terms of the Protective Order.

2. Verizon objects to AT&T's Data Requests to the extent that all or any of them seek attorney work product or information protected by the attorney-client privilege.

3. Verizon objects to AT&T's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information that is neither relevant to this case nor likely to lead to the discovery of admissible evidence, or otherwise seek to impose upon Verizon discovery obligations beyond those required by 47 CFR § 1.311 et seq.

4. Verizon objects to AT&T's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, are overly broad and unduly burdensome.

5. Verizon objects to AT&T's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information from independent corporate affiliates of Verizon Virginia Inc., or from board members, officers or employees of those independent corporate affiliates, that are not parties to this proceeding.

6. Verizon objects to AT&T's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein,

seek information relating to operations in any territory outside of Verizon Virginia Inc. territory.

7. Verizon objects to AT&T's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek discovery throughout the Verizon footprint. This proceeding involves only Verizon Virginia Inc. and relates only to the terms of interconnection and resale in Virginia. Moreover, as the Commission has assumed the jurisdiction of the Virginia State Corporation Commission in this matter, it has no jurisdiction over Verizon entities that do not conduct business in Virginia. See Memorandum Opinion and Order, In the Matter of Petition of AT&T Communications of Virginia, Inc. for Preemption Jurisdiction of the Virginia State Corporation Commission Pursuant to Section 252(E)(5) of the Telecommunications Act of 1996, CC Docket No. 00-251 (January 26, 2001).

8. Verizon objects to AT&T's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information that is confidential or proprietary to a customer, CLEC or other third party. Verizon has an obligation to safeguard such information from disclosure. Thus, while Verizon may be in possession of such information, it does not have the authority to disclose that information to AT&T or any other entity.

SPECIFIC OBJECTIONS

In addition to the foregoing General Objections and without waiver of same, Verizon objects specifically to AT&T's Data Requests as follows:

ITEM: AT&T 5-1 Provide Verizon Virginia line counts (line counts referring to the number of voice grade equivalents -- or DS0 equivalents), by wire center, for residential, business, single-line business, special access and public lines, in an electronic form to the extent available for the years 1996, 1997, 1998, 1999 and 2000. Produce any and all documents concerning, referring or relating to the development of this data.

REPLY: See General Objections. Verizon Virginia further objects to this request on the grounds that the requested information is not kept in the normal course of business. Rather, answering this request would require Verizon Virginia to undertake an extraordinarily burdensome and time-consuming study.

VZ VA #188

ITEM: AT&T 5-2 Provide, by wire center, Verizon Virginia end of year 2001 and end of year 2002 forecasted line counts (line counts referring to the number of voice grade equivalents -- or DS0 equivalents) for residential, business, single-line business, special access and public lines, in an electronic form to the extent available. Produce any and all documents concerning, referring or relating to the development of this data.

REPLY: See General Objections. Verizon Virginia further objects to this request on the grounds that the requested information is not kept in the normal course of business. Rather, answering this request would require Verizon Virginia to undertake an extraordinarily burdensome and time-consuming study.

VZ VA #189

ITEM: AT&T 5-3 Provide state-wide Verizon Virginia forecasted line counts (line counts referring to the number of voice grade equivalents -- or DS0 equivalents) for the next five years (or as many years as are available) for residential, business, single-line business, special access and public lines, in an electronic form to the extent available. Produce any and all documents concerning, referring or relating to the development of this data.

REPLY: See General Objections. Verizon Virginia further objects to this request on the grounds that the requested information is not kept in the normal course of business. Rather, answering this request would require Verizon Virginia to undertake an extraordinarily burdensome and time-consuming study.

VZ VA #190

ITEM: AT&T 5-4 Provide Verizon Virginia line counts (line counts referring to the number of working loops), by wire center, for residential, business, single-line business, special access and public lines, in an electronic form to the extent available for the years 1996, 1997, 1998, 1999 and 2000. Produce any and all documents concerning, referring or relating to the development of this data.

REPLY: See General Objections.

VZ VA #191

ITEM: AT&T 5-5 Provide, by wire center, Verizon Virginia end of year 2001 and end of year 2002 forecasted line counts (line counts referring to the number of working loops) for residential, business, single-line business, special access and public lines, in an electronic form to the extent available. Produce any and all documents concerning, referring or relating to the development of this data.

REPLY: See General Objections.

VZ VA #192

ITEM: AT&T 5-6 Provide state-wide Verizon Virginia forecasted line counts (line counts referring to the number of working loops) for the next five years (or as many years as are available) for residential, business, single-line business, special access and public lines, in an electronic form to the extent available. Produce any and all documents concerning, referring or relating to the development of this data.

REPLY: See General Objections.

VZ VA #193

Respectfully submitted,

Karen Zacharia / by permission
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Michael E. Glover
Of Counsel

Richard D. Gary
Kelly L. Faglioni
Hunton & Williams
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, Virginia 23219-4074
(804) 788-8200

Catherine Kane Ronis
Wilmer, Cutler & Pickering, LLP
2445 M Street, NW
Washington, DC 20037-1420

Of Counsel

Dated: July 5, 2001

Karen Zacharia
David Hall
1320 North Court House Road
Eighth Floor
Arlington, Virginia 22201
(703) 974-2804

Lydia R. Pulley
600 E. Main St., 11th Floor Richmond, VA
23233
(804) 772-1547

Attorneys for Verizon

CERTIFICATE OF SERVICE

I do hereby certify that true and accurate copies of the foregoing Objections to AT&T's Fifth Set of Data Requests were served electronically and by overnight mail this 5th day of July, 2001, to:

Mark A. Keffer
Dan W. Long
Stephanie Baldanzi
AT&T
3033 Chain Bridge Road
Oakton, Virginia 22185
(703) 691-6046 (voice)
(703) 691-6093 (fax)

and

David Levy
Sidley & Austin
1722 Eye Street, N.W.
Washington, D.C. 20006
(202) 736-8214 (voice)
(202) 736-8711 (fax)


